

ME OFFICE
2 VICTORIA LANE
FALMOUTH, ME 04105

NY OFFICE
244 FIFTH AVE
SUITE E121
NEW YORK, NY 10001



DMITRY LAPIN, ESQ.

NJ OFFICE
411 HACKENSACK AVE
SUITE 200
HACKENSACK, NJ 07106

PA OFFICE
21 S. 11TH ST
FLOOR 2
PHILADELPHIA, PA 19107

MISC 21 - 3181

November 3, 2021

VIA PRIORITY MAIL

Clerk of Court
District Court, Eastern District of New York
225 Cadman Plaza East,
Brooklyn, New York 11201

FILED
IN CLERK'S OFFICE
U.S. DISTRICT COURT E.D.N.Y.

★ NOV 05 2021 ★

BROOKLYN OFFICE

Re: In Re: DMCA Subpoena to Etsy, Inc.
Jon Q. Wright, request for issuance of Subpoena Duces Tecum, pursuant to 17. U.S.C.
512(h)

To the Clerk of Court,

On behalf of my client, Jon Q. Wright, I respectfully request that the Clerk issue a subpoena pursuant to 17 U.S.C. 512(h). By way of background, Section 512(h) of the Digital Millennium Copyright Act provides that a "copyright owner or a person authorized to act on the owner's behalf may request the clerk of any United States District Court to issue a subpoena to a service provider for identification of an alleged infringer in accordance with" 17 U.S.C. 512(h)(1). For a subpoena to be issued, Section 512(h) requires that a copyright owner file the following with the Clerk:

- 1) a proposed subpoena,
- 2) the statutorily required declaration to the effect that the purpose for which the subpoena is sought is to obtain the identity of an alleged infringer and that such information will only be used for the purpose of protecting rights under this title, and
- 3) copies of the DMCA takedown notifications sent to Etsy, Inc.

Accordingly, enclosed please find the aforementioned documents, the accompanying exhibits, as well as the appropriate filing fee for this matter.

Sincerely,

A handwritten signature in black ink, appearing to be 'DL' or similar initials, followed by a horizontal line.

Dmitry Lapin, Esq.

enclosures

ADMITTED IN NEW YORK, NEW JERSEY, MAINE, AND PENNSYLVANIA

DIRECT: 207.464.0099 ■ EMAIL: DMITRY@EMILYESQUIRE.COM
WWW.EMILYESQUIRE.COM